

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

THE ILLINOIS POWER AGENCY)	
)	
Petition for a Certificate of Public Convenience and)	
Necessity, pursuant to Section 8-406.1 of the Illinois)	
Public Utilities Act, and an Order pursuant to Section 8-)	
503 of the Public Utilities Act, to Construct, Operate and)	Docket No. 12-0598
Maintain a New High Voltage Electric Service Line and)	
Related Facilities in the Counties of Adams, Brown,)	
Cass, Champaign, Christian, Clark, Coles, Edgar, Fulton,)	
Macon, Montgomery, Morgan, Moultrie, Pike,)	
Sangamon, Schuyler, Scott and Shelby, Illinois.)	

**CLARK COUNTY PRESERVATION COMMITTEE RESPONSE TO AMEREN
TRANSMISSION COMPANY OF ILLINOIS OPPOSITION TO PETITION FOR
LEAVE TO INTERVENE**

Petitioners, Ted Snedeker, Lola Kay Snedeker, Frank McEachran, Doris Kay Gard, Chris Dashielle, Tasha Dashiell, Kevin Snedeker, Nancy Snedeker, Kenny Snedeker, Sue Snedeker, Tom Kuykendall, Lynda Kuykendall, Tuffy Ellis, Karen Ellis, Travis Hibschrnann, Lynda Hibschrnann, Michael Switzer, Michelle Switzer, Eric Wallace, Doug Dahnke, David Miller, Linne Miller, Missy Finkbiner, Carl Wallace, Michael Wade Switzer, Kevin Miller, Ken Cannady, and Penny Cannady, (hereinafter the "Clark County Preservation Committee" or "CCPC") by counsel and hereby submits to the Illinois Commerce Commission (the "Commission") its Response to Ameren Transmission Company of Illinois's (the "ATXI"). Response in Opposition to CCPC's Verified Petition for Leave to Intervene. In support of its Response, the CCPC states as follows:

1. On November 26, 2012, the CCPC submitted to the Commission its original Verified Petition for Leave to Intervene (the "Original Petition").
2. On November 29, 2012, ATXI submitted its Response in Opposition to the Original Petition (the "Response").

3. On December 12, 2012, CCPC submitted its Motion to Amend Verified Petition for Leave to Intervene. On December 12, 2012, the Commission granted CCPC's Motion.

4. On December 17, 2012, CCPC submitted its Amended Verified Petition for Leave to Intervene (the "Amended Petition"). A copy of this Amended Petition is attached as Exhibit A.

5. ATXI's Response against CCPC's Original Petition rests on the argument that the CCPC does not have standing to Intervene by failing to state a legally protectable interest. ATXI states that CCPC's Original Petition does not contain a plain and concise statement of the nature of the Committee's interest and argues CCPC's Original Petition's alleged interest is "overbroad, vague and generic." CCPC's Original Petition interest was "quality of life, property values and health of all Clark County residents."

6. CCPC's Amended Petition remedies the proposed deficiencies of the Original Petition by specifying that its interest in the matter is the negative effect the proposed project will have on the value of each legal property interest held by the Petitioners comprising the CCPC. Each Petitioner's individual legal property interest is detailed and attached as Exhibit B.

7. Furthermore, ATXI's Response against CCPC's Original Petition rests on the argument that CCPC's members do not "possess a distinct legal interest which could be directly and adversely affected by the Commission's order in this proceeding." This argument is buttressed by ATXI's opinion that CCPC's Original Petition fails to adequately identify the actual members of CCPC and subsequently, to identify the effect of the proceeding on these members' legal interests.

8. CCPC's Amended Petition, again, remedies the deficiencies argued by ATXI by adequately identifying the actual petitioners that comprise the CCPC and the address and

description of any legal interest that would be adversely affected. Each Petitioner's individual legal property interest is identified, detailed and attached as Exhibit B.

9. Because CCPC's Amended Petition remedies any of the alleged defects in its Original Petition, ATXI's Response is no longer relevant and CCPC's Amended Petition should be granted, barring future objection by any party.

WHEREFORE, Petitioners respectfully request that they be permitted to intervene, and become parties to the above styled proceeding.

Dated: December 17, 2012

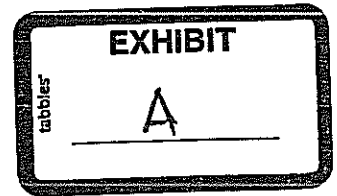
Respectfully submitted,

SEVER-STOREY, LLP

A handwritten signature in black ink, appearing to read 'Jordan Walker', is written over a horizontal line.

Jordan Walker
Attorney for Defendants

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION



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Macon, Montgomery, Morgan, Moultrie, Pike,)
Sangamon, Schuyler, Scott and Shelby, Illinois.)

Docket No. 12-0598

CLARK COUNTY PRESERVATION COMMITTEE'S AMENDED VERIFIED
PETITION FOR LEAVE TO INTERVENE

Petitioners, Ted Snedeker, Lola Kay Snedeker, Frank McEachran, Doris Kay Gard, Chris Dashielle, Tasha Dashiell, Kevin Snedeker, Nancy Snedeker, Kenny Snedeker, Sue Snedeker, Tom Kuykendall, Lynda Kuykendall, Tuffy Ellis, Karen Ellis, Travis Hibschiemann, Lynda Hibschiemann, Michael Switzer, Michelle Switzer, Eric Wallace, Doug Dahnke, David Miller, Linne Miller, Missy Finkbiner, Carl Wallace, Michael Wade Switzer, Kevin Miller, Ken Cannady, and Penny Cannady, (hereinafter the "Clark County Preservation Committee" or "CCPC") by counsel and pursuant to 83 Illinois Administrative Code Sections 200.190 and 200.140, hereby submits to the Illinois Commerce Commission (the "Commission") its Amended Petition for Leave to Intervene. In support of its Amended Petition, the CCPC states as follows:

1. The Petitioners are landowners and/or holders of legal property interests of land that will suffer negative effects—in the form of a decrease in value of the property interest—by one or more of the routes in the proposed project related to this filing and the authority sought by Ameren Transmission Company of Illinois (the "ATXI"). A full list of Petitioners, their relevant



property addresses, and respective property interest relative to the proposed project related to this filing is attached as Exhibit A (Note: "Adjacent Landowner" indicates property owner where proposed project related to this docket crosses property either adjacent or so near as to cause a significant decrease in value to the legal interest held by said landowner).

2. The Petitioners will be substantially affected by any decision of the Commission in the above entitled docket, and as such Petitioners wish to participate in this proceeding and present their position as needed.

3. As provided for in 83 Ill. Admin. Code § 200.150, CCPC agrees to accept service by electronic means and request that the following person be added to the service list:

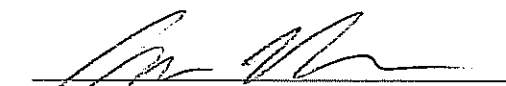
Jordan H. Walker
SEVER-STOREY, LLP
335 Ridgepoint Dr.
Carmel, Indiana 46032
Telephone: (317) 575-9942
Fax: (317) 575-9943
Jordan@severstorey.com

WHEREFORE, Petitioners respectfully request that they be permitted to intervene, and become parties to the above styled proceeding.

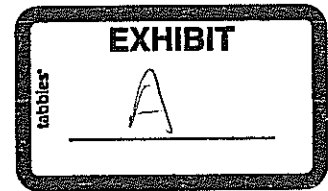
Dated: December 17, 2012

Respectfully submitted,

SEVER-STOREY, LLP

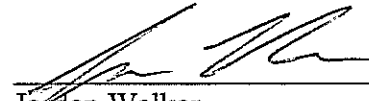

Jordan Walker,
Attorney for Clark County
No.: 6310424

Jordan H. Walker
SEVER-STOREY, LLP
335 Ridgepoint Dr.
Carmel, Indiana 46032
Telephone: (317) 575-9942
Fax: (317) 575-9943
Jordan@severstorey.com



VERIFICATION

I, Jordan Walker, being sworn on oath, state that the aforementioned Amended Petition for Leave to Intervene is true and accurate to the best of my knowledge, information and belief.




Jordan Walker

STATE OF INDIANA)
) SS:
COUNTY OF HAMILTON)

Before me the undersigned, a Notary Public for said County and State, personally appeared Jordan Walker, who, having been duly sworn, acknowledged the foregoing statements as true.

WITNESS my hand and Notarial Seal, this 17 day of December, 2012:



Notary Public
Phil Sever

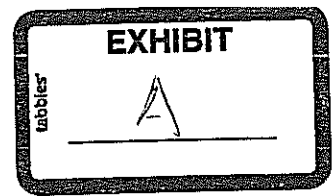
Printed Name

My commission expires:

*Philip D. Sever, Esq
Notary Public, State of Ohio
My Commission Does Not Expire*

Notary resides in Hamilton County.

EXHIBIT A



J. T. (Ted) Snedeker
Property Interest: Landowner
PO Box 177
Marshall, IL 62441

Frank McEachran
Property Interest: Adjacent Landowner
17074 E 1530th Road
Marshall, IL 62441

Chris & Tasha Dashiell
Property Interest: Adjacent Landowner
14712 E Arbuckle Road
Marshall, IL 62441

Kenny and Sue Snedeker
Property Interest: Landowner
14378 E Arbuckle Road
Marshall, IL 62441

Tuffy and Karen Ellis
Property Interest: Adjacent Landowner
16203 E Arbuckle Road
Marshall, IL 62441

Michael & Michelle Switzer
Property Interest: Adjacent Landowner
16988 E Arbuckle Road
Marshall, IL 62441

Doug Dahnke
Property Interest: Landowner
10015 E US 40
Martinsville, 62442

Missy Finkbiner
Property Interest: Landowner
101 Brushcreek Drive
Marshall, IL 62441

Michael Wade Switzer
Property Interest: Adjacent Landowner
17071 E 1530th Road
Marshall, IL 62441

Lola Kay Snedeker
Property Interest: Landowner
15635 E Arbuckle Road
Marshall, IL 62441

Doris Kay Gard
Property Interest: Landowner
1209 Cedar Lane
Marshall, IL 62441

Kevin and Nancy Snedeker
Property Interest: Landowner
15125 E Arbuckle Road
Marshall, IL 62441

Tom and Lynda Kuykendall
Property Interest: Landowner
14866 E Arbuckle Road
Marshall, IL 62441

Travis and Lynda Hibschiemann
(Chris Amacher Trust)
Property Interest: Landowner
20046 E 610th road
West Union, IL 62477

Eric Wallace
Property Interest: Adjacent Landowner
12738 E US Highway 40
Marshall, IL 62441

David and Lianne Miller
Property Interest: Landowner
14577 N 2050th Street
Marshall, IL 62441

Carl Wallace
Property Interest: Adjacent Landowner
16992 Arbuckle Road
Marshall, IL 62441

Kevin Miller
Property Interest: Landowner
21111 E Macke Road
Marshall, IL 62441

Ken & Penny Cannady
Property Interest: Landowner
15982 E Arbuckle Road
Marshall, IL 62441

EXHIBIT A

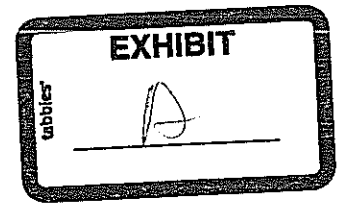


EXHIBIT B

J. T. (Ted) Snedeker
Property Interest: Landowner
PO Box 177
Marshall, IL 62441

Frank McEachran
Property Interest: Adjacent Landowner
17074 E 1530th Road
Marshall, IL 62441

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Property Interest: Adjacent Landowner
14712 E Arbuckle Road
Marshall, IL 62441

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Property Interest: Landowner
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Marshall, IL 62441
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Property Interest: Adjacent Landowner
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Kevin Miller
Property Interest: Landowner
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Marshall, IL 62441

EXHIBIT ~~A~~B

Ken & Penny Cannady
Property Interest: Landowner
15982 E Arbuckle Road
Marshall, IL 62441